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Attorneys for Defendant
Sinochem Jiangsu Corporation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ZIM INTEGRATED SHIPPING SERVICES, LTD.,

Plaintiff,

— v. —

BELCO RESOURCES, INC., SINOCHEN JIANGSU
CORPORATION (FORMERLY KNOWN AS SINOCHEN
JIANGSU IMPORT & EXPORT CORPORATION),
NANJING HUABIN FOREIGN TRADE & ECONOMICS
CO., LTD., DRAGONTRANS SHIPPING LTD. d/b/a
HUABANG INTERNATIONAL, INC., SINOTRANS
NINGBO INTERNATIONAL FORWARDING AGENCY
CO., LTD., JOHN DOE 1-10,

Defendants.

07 CIV 5861 (RMB)

**DECLARATION
OF HILLEL I. PARNESS**

I, HILLEL I. PARNESS, hereby declare under penalty of perjury as follows:

1. I am Of Counsel to Lovells LLP, counsel to Defendant Sinochem Jiangsu Corporation (“Sinochem Jiangsu”) in the above-captioned matter, and I submit this declaration in support of the Motion to Dismiss with Prejudice Counts II through IX of the Second Amended Complaint and to Vacate the Attachment, being submitted this day by Sinochem Jiangsu, to which Defendant Nanjing Huabin Foreign Trade & Economics Co., Ltd also joins. I am a member in good standing of the Bar of the State of New York and of this Court.

2. The facts described herein are those that are by their nature part of the public record and obtained via certain free, public access sites available to all users of the world-wide web. This affidavit is limited to two such facts.

3. First, that, according to the Substance Registry System of the U.S. Environmental Protection Agency (the "EPA Registry"), the chemical name "Calcium Oxychloride" is synonymous with the chemical name "Calcium Hypochlorite." *See* EPA Substance Registry System, *available at* http://iaspub.epa.gov/srs/srs_proc_qry.navigate?P_SUB_ID=153932#7. A true and correct copy of the entry for Calcium Hypochlorite in the EPA Registry is attached hereto as Exhibit A.

4. Second, that, Plaintiff regularly conducts business in China. According to Plaintiff's website, it has twenty-one separate offices operating in the People's Republic of China. *See* Zim Integrated Shipping Services Ltd., Global Network Page, <http://www.zim.com>¹ (last visited Nov. 27, 2007). A true and correct compilation of information obtained from Plaintiff's website regarding its offices in China is attached hereto as Exhibit B.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 28, 2007
New York, New York


Hillel J. Parness

¹ The full web address is as follows: http://www.zim.co.il/Find_Agent.aspx?hidSubmit=false&id=153&l=4&cFullName=&isFromMap=false&searchType=9&ZimCode=&AgencyCode=&AgencyName=&PageType=0&searchByNameTextBox=&selectArea=AS&selectCountry=CHN&selectCity=-1